

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

VERY REVEREND GEORGES F. de
LAIRE, J.C.L.,

Plaintiff,

v.

GARY MICHAEL VORIS, ANITA CAREY,
ST. MICHAEL'S MEDIA a/k/a CHURCH
MILITANT, and MARC BALESTRIERI

Defendants.

CIVIL ACTION NO. 1:21-cv-00131-JL

**PLAINTIFF'S REQUEST FOR A STATUS CONFERENCE TO DISCUSS PRE-TRIAL
SCHEDULING MATTERS**

Plaintiff the Very Reverend Georges F. de Laire, J.C.L respectfully requests that the Court hold a status conference to discuss and resolve potential scheduling issues that have arisen since the Parties' recent joint motion to extend pre-trial deadlines. Plaintiff sought Defendants' consent to the relief requested in the foregoing in the morning of July 28, 2023. As of the time of this filing, Defendants have not responded to that request. In support of this request, Plaintiff states as follows:

1. Plaintiff has requested, and the Court has allowed, three (3) depositions to be taken in this matter to address discovery matters that arose in late June and July of 2023. See, e.g., ECF No. 163.
2. Notwithstanding Plaintiff's prompt attempts to schedule said deposition, schedules dictate that the ordered depositions will take place on August 8 and 9, 2023. The deposition of Defendant St. Michael Media's employee, Christine Niles, is scheduled to commence on August 9, 2023 at 1 p.m.; however, the Court has not imposed a time

limitation on that deposition, and has further not limited the scope of questioning at that deposition. Therefore, it is possible that Ms. Niles' deposition cannot be completed in the afternoon of August 9, 2023, and will need to be continued to a second day.

3. On July 27, 2023, Defendants further supplemented their prior document productions with approximately 70 pages of additional documents. Certain of those documents raise additional concerns about the relationship – including a financial relationship – between St. Michael's Media and Defaulted Defendant Marc Balestrieri. Plaintiff cannot assess the extent of these issues prior to the deposition of Mr. Voris, which is scheduled for 9 a.m. on August 8, 2023.
4. The current deadline for pre-trial filings is August 11, 2023, only three days after the deposition of Mr. Voris, and two days after the (potentially partial) deposition of Ms. Niles.
5. Plaintiff anticipates that these depositions will support his positions in currently-contemplated pre-trial motions, and may reveal the necessity for further pre-trial motions.
6. As expressed at the July 14, 2023 status conference, the Court and the Parties remain committed to commencing the trial of this matter in September of 2023. In light of the foregoing, and in support of this shared goal, the Plaintiff respectfully requests a status conference to discuss these matters of timing and pretrial filings, as well as a potential brief continuation of the trial of this matter to another date in September 2023.

WHEREFORE, Plaintiff respectfully requests that the Court set this matter for a brief status conference, to be held via Zoom for either Tuesday, August 1, 2023, or Wednesday, August 2, 2023.

Respectfully submitted,

THE VERY REVEREND
GEORGES F. DE LAIRE

By his attorneys:

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CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2023 I electronically filed the above document(s) with the Clerk of the Court using the ECF system, which will send notification of such filing to those who are currently on the list to receive e-mail notices for this case.

/s/ Suzanne M. Elovecky
Suzanne M. Elovecky

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